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9 UNITED STATES DISTRICT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

4:15-CR-6049-EFS

12 Plaintiff,

SECOND SUPERSEDING  
INDICTMENT

13 vs.

14 Vio: 21 U.S.C. § 846  
15 Conspiracy to Distribute 500  
16 Grams or More of a Mixture or  
17 Substance Containing a  
18 Detectable Amount of  
19 Methamphetamine, 5 Kilograms  
20 or More of Cocaine, 1 Kilogram  
21 or More of Heroin and 400 grams  
22 or More of N-phenyl-N  
23 Propanamide  
24 (Count 1)

25 BRITTNEY LEE ZARAGOZA,

26 Vio: 18 U.S.C. § 1956(h)  
27 Conspiracy to Commit Money  
28 Laundering (Count 2)

29 Vio: 21 U.S.C. § 841(a)(1),  
30 (b)(1)(A)(ii)  
31 Possession with the Intent to  
32 Distribute 5 Kilograms or more of  
33 Cocaine (Count 3)

34 SECOND SUPERSEDING INDICTMENT – 1

Second Superseding Indictment.docx

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]

Vio: 18 U.S.C. § 1956(a)(1)(B)(i)  
Money Laundering  
(Counts 4, 5, 6, 7, 10, 11, 12, 14)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(viii)  
Possession with the Intent to  
Distribute 50 grams or more of  
Actual Methamphetamine  
(Count 8)

8  
9  
10 Defendants.

Vio: 18 U.S.C. 1956(a)(1)(B)(i)  
International Money Laundering  
(Counts 9, 13)

11  
12 Vio: 21 U.S.C. § 841(a)(1),  
13 (b)(1)(A)(i), (vi)  
14 Possession with the Intent to  
15 Distribute 1 Kilogram or More of  
16 a Mixture or Substance  
17 Containing Heroin and  
18 400 grams or More of a Mixture  
19 or Substance Containing N-  
20 phenyl-N Propanamide  
21 (Count 15)

22 Notice of Criminal Forfeiture  
23 Allegations

24 The Grand Jury Charges:

25 **COUNT ONE**

26 Beginning on a date unknown but by on or about January 2010 continuing  
27 until on or about December 6, 2016, in the Eastern District of Washington and  
28 elsewhere, the Defendants, [REDACTED]

SECOND SUPERSEDING INDICTMENT – 2

Second Superseding.Indictment.docx

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED],  
15 did knowingly and intentionally combine, conspire, confederate and agree together  
16 with each other and other persons, both known and unknown to the Grand Jury, to  
17 commit the following offense against the United States, to wit: distribution of 500  
18 grams or more of a mixture or substance containing a detectable amount of  
19  
20  
21 Methamphetamine, 5 kilograms or more of a mixture or substance containing a  
22 detectable amount of Cocaine, 1 kilograms or more of a mixture or substance  
23 containing a detectable amount of heroin and 400 grams or more of a mixture or  
24 substance containing a detectable amount of N-phenyl-N Propanamide, all  
25 Schedule II controlled substances, in violation of 21 U.S.C. § 841(a)(1),  
26  
27 (b)(1)(A)(i), (ii)(I), (vi), and (viii); all in violation of 21 U.S.C. § 846.  
28

SECOND SUPERSEDING INDICTMENT – 3

Second Superseding Indictment.docx

**COUNT TWO**

Beginning on a date unknown but by on or about January 2010 continuing until present time, in the Eastern District of Washington and elsewhere, the

Defendants, [REDACTED]

[REDACTED]

[REDACTED], BRITTNEY LEE ZARAGOZA, [REDACTED],

[REDACTED], and

others known and unknown, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to commit certain money laundering offenses under 18 U.S.C. § 1956, as follows:

**(1956(a)(1))**

The Defendants named in this count: did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, and transactions involving the use of a financial institution which is engaged in and affects interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the property involved in the financial transactions represents the proceeds of some form of unlawful activity, knowing that the transactions are designed in whole or in part to

1 conceal and disguise the nature, the location, the source, the ownership, and the  
2 control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C.  
3 § 1956(a)(1)(B)(i); and  
4

5  
6 **(1956(a)(2))**

7 The Defendants named in this count: did transport, transmit, and transfer,  
8 and attempt to transport, transmit, and transfer a monetary instrument and funds  
9 from a place in the United States to and through a place outside the United States  
10 with the intent to promote the carrying on of specified unlawful activity, that is,  
11 conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§  
12 841(a)(1), (b)(1)(A), and 846; in violation of 18 U.S.C. § 1956(a)(2)(A).  
13  
14

15 The Grand Jury further alleges this offense was committed during and in  
16 furtherance of the conspiracy charged in Count One, above.  
17

18 All in violation of 18 U.S.C. § 1956(h).  
19

20 **COUNT THREE**

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

**COUNT FOUR**

[REDACTED],

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**COUNT FIVE**

[REDACTED]

[REDACTED],

[REDACTED]

[REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]

16  
17 **COUNT SIX**

18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]

11 **COUNT SEVEN**

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]



1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 **COUNT EIGHT**

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 **COUNT NINE**

15 [REDACTED]

16 [REDACTED],

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED],

28 [REDACTED]

**COUNT TEN**

**COUNT ELEVEN**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**COUNT TWELVE**

On or about May 17, 2016 and continuing until on or about May 18, 2016,  
in the Eastern District of Washington and elsewhere, the Defendant, BRITTNEY  
LEE ZARAGOZA, did conduct and attempt to conduct a financial transaction  
affecting interstate and foreign commerce, to wit: a money wire transfer of U.S.

SECOND SUPERSEDING INDICTMENT – 11

Second Superseding Indictment.docx

1 funds to a Wells Fargo account in the name of Brittney Zaragoza located in  
2 Kennewick, Washington; which involved the proceeds of a specified unlawful  
3 activity, that is conspiracy to distribute and the distribution of controlled  
4 substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing  
5 that the transaction was designed in whole or in part to conceal and disguise the  
6 nature, the location, the source, the ownership, and the control of the proceeds of  
7 the specified unlawful activity, and that while conducting and attempting to  
8 conduct such financial transaction knew that the property involved in the financial  
9 transaction, that is funds in the amount of \$3,000 represented the proceeds of some  
10 form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.  
11  
12  
13  
14

15  
16 **COUNT THIRTEEN**

17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED],

**SECOND SUPERSEDING INDICTMENT – 12**

Second Superseding Indictment.docx

**COUNT FOURTEEN**

On or about May 26, 2016, and continuing until on or about June 3, 2016, in the Eastern District of Washington and elsewhere, the Defendant, BRITTNEY LEE ZARAGOZA, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money wire transfer of U.S. currency to a Wells Fargo account in the name of Brittney Zaragoza located in Kennewick, Washington; which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds in the amount of \$3,000 represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

**COUNT FIFTEEN**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS**

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. § 846, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] BRITTNEY LEE ZARAGOZA,

1 [REDACTED],  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED], and, shall forfeit to the United  
10 States of America, any property constituting, or derived from, any proceeds  
11 obtained, directly or indirectly, as the result of such offense(s) and any property  
12 used or intended to be used, in any manner or part, to commit or to facilitate the  
13 commission of the offense(s).  
14  
15  
16

17 If any forfeitable property, as a result of any act or omission of the  
18 Defendants:  
19

- 20 (a) cannot be located upon the exercise of due diligence;  
21 (b) has been transferred or sold to, or deposited with, a third party;  
22 (c) has been placed beyond the jurisdiction of the court;  
23 (d) has been substantially diminished in value; or  
24 (e) has been commingled with other property which cannot be divided  
25 without difficulty;  
26  
27  
28

1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p).  
3

4 DATED this \_\_\_\_ day of December 2016.  
5

6 A TRUE BILL  
7

8   
9 Foreperson

10   
11  
12 MICHAEL C. ORMSBY  
13 United State Attorney

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15  
16 Stephanie A. Van Marter  
17 Assistant United States Attorney  
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